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SEAN JOYCE
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October 3, 2016

VIA ELECTRONIC FILING

Hon. Ann Marie Donio, U.S.M.J.
U.S. District Court, District of New Jersey
Mitchell H. Cohen U.S. Courthouse -Room 2010
1 John F. Gerry Plaza, 4th & Cooper Streets
Camden, NJ 08101

Re: La Mecia Ross-Tiggett v. Reed Smith LLP, et al.
Case No. 1:15-cv-08083-JBS-AMD

Dear Judge Donio:

This firm is counsel to Defendants, Reed Smith LLP and Christine Phillips Gonzales, in the above matter. We write regarding ongoing discovery issues between the parties. We have attempted to meet and confer with the Plaintiff regarding these discovery issues, but have not received a response, let alone responses to our discovery demands. In that regard, attached please see our prior letters of August 5, 2016 and September 9, 2016. For purposes of a more complete record, also attached hereto is Plaintiff's August 9, 2016 correspondence.

As highlighted in our September 9, 2016 letter, the Plaintiff is in default on all of her written discovery obligations. Pursuant to the Court's prior Orders, Plaintiff is long overdue in her discovery responses. This also includes a copy of the materials Plaintiff provided to the Court, including the "CD-R containing Plaintiff's exhibits" as referenced in her March 4, 2016 correspondence. Your Honor ordered the production of this material back in April. Indeed, fact discovery is scheduled to end on October 31, 2016. In order to properly plan for and take the Plaintiff's deposition, Defendants need written discovery responses. Despite our request to have a response by September 23, 2016, we have yet to receive any.

Moreover, despite our prior requests, including August 5, 2016 and September 9, 2016, Plaintiff has not provided any available dates for her deposition. We asked for available dates by September 16, 2016, but have not received a response. Given the pending pretrial factual discovery end date of October 31, 2016, it is imperative that Plaintiff provide consecutive dates for her deposition consistent with the Scheduling Order in this matter.

CARMAGNOLA & RITARDI, LLC

Hon. Ann Marie Donio, U.S.M.J.
October 3, 2016
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Unfortunately, we are left with no alternative but to reach out to Your Honor for assistance in resolving these discovery issues. We thank Your Honor for her consideration in this regard.

Respectfully submitted,

CARMAGNOLA & RITARDI, LLC



SEAN JOYCE
For the Firm

cc: La Mecia Ross-Tiggett, Plaintiff *Pro Se*, via Certified and Regular Mail
Domenick Carmagnola, Esq.
Reed Smith LLP



CARMAGNOLA & RITARDI, LLC
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R.SHANE KAGAN
skagan@cr-law.net

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August 5, 2016

VIA CERTIFIED/RRR AND REGULAR MAIL

La Mecia Ross-Tiggett
25103 Osprey Way
Princeton Junction, NJ 08550

**Re: LaMecia Ross-Tiggett v. Reed Smith LLP, et al.
Case No.: 1:15-cv-08083-JBS-AMD**

Dear Ms. Ross-Tiggett:

In following up on prior correspondence, please immediately provide us with dates in late August through September that you are available for your deposition, keeping in mind that your deposition will require at least two consecutive dates. If you prefer, I am also available to speak live on this matter.

Very truly yours,

CARMAGNOLA & RITARDI, LLC

R. SHANE KAGAN
For the Firm

SK/ns

cc: Domenick Carmagnola, Esq.

Aug 09 16 04:04p

La Mecia Ross-Tiggett

(609) 785-5325

p.1

La Mecia Ross-Tiggett
Plaintiff, Pro Se
25103 Osprey Way
Princeton Junction, NJ 08550
(609) 914-5353

August 9, 2016

VIA FACSIMILE

R. Shane Kagan, Esq.
Carmagnola & Ritardi, LLC
60 Washington Street
Morristown, NJ 07960

Re: La Mecia Ross-Tiggett v. Reed Smith, LLP, et al.
Civil Action No. 1:15-cv-08083- JBS-AMD

Dear Mr. Kagan:

My name is La Mecia Ross-Tiggett and as you know I am the Pro Se Plaintiff in the above action. I am in receipt of your correspondence regarding deposition dates this matter. As you may recall, on May 19, 2016 and May 29, 2016, I faxed two letters to your office advising that I was unavailable for deposition on the July 6, 2016 and July 7, 2016. In both letters, I offered two weeks, the week of July 25, 2016 and the week of August 1, 2016, both of which included consecutive dates of availability. You never accepted any of the proposed dates.

At this time, I currently have no availability in August as I am preparing one child for her senior year, two children for college and myself for orientation and the beginning of the fall semester at graduate school. At the moment I do not have a copy of my school schedule for September and am unable to offer any dates of availability at this time. However, as soon as this information is provided, I will contact your office with proposed dates.

Additionally, while attending a six week preparatory program, I noticed that you provided discovery responses, however, I was not home to retrieve them from the post office. When I finally arrived home and attempted to retrieve them, I was informed that they were returned to your office. I would be more than happy to have a FedEx Ground pickup scheduled to retrieve the responses and/or document production and assume to the cost, if you could kindly provide for an appropriate date and time for retrieval.

Finally, my technology issues have been resolved. I am actively working on the appropriate responses ordered by the Court and to Defendants' discovery demands. Please be further advised that I am still actively and continuously seeking counsel in this matter.

Sincerely,



La Mecia Ross-Tiggett

Enclosures

Aug 09 16 04:04p

La Mecia Ross-Tiggett

(609) 785-5325

p.2

La Mecia Ross-Tiggett
Plaintiff, Pro Se
25103 Osprey Way
Princeton Junction, NJ 08550
(609) 914-5353

May 19, 2016

VIA FACSIMILE

Domenick Carmagnola
60 Washington Street
Morristown, NJ 07960

Re: **La Mecia Ross-Tiggett v. Reed Smith, LLP, et al.**
Civil Action No. 1:15-cv-08083- JBS-AMD

Dear Mr. Carmagnola:

My name is La Mecia Ross-Tiggett and as you know I am the pro se Plaintiff in the above action. I am in receipt of your deposition notice dated May 17, 2016, noticing me for depositions which are scheduled to take place July 6-7, 2016, beginning at 10:00 a.m., at your office.

Please be advised that I am not available for depositions on the dates noticed. My first available date to be deposed will not be until July 25, 2016. As of this date, as far as I know I am available for depositions that entire week and possibly the week of August 1-5, 2016.

Please let me know, as soon as possible, if these dates work for you.

Sincerely,



La Mecia Ross-Tiggett

Aug 09 16 04:04p

La Mecia Ross-Tiggett

(609) 785-5325

p.3

La Mecia Ross-Tiggett
Plaintiff, Pro Se
25103 Osprey Way
Princeton Junction, NJ 08550
(609) 914-5353

May 29, 2016

VIA FACSIMILE
Domenick Carmagnola
60 Washington Street
Morristown, NJ 07960

SECOND NOTICE

Re: **La Mecia Ross-Tiggett v. Reed Smith, LLP, et al.**
Civil Action No. 1:15-cv-08083- JBS-AMD

Dear Mr. Carmagnola:

My name is La Mecia Ross-Tiggett and as you know I am the pro se Plaintiff in the above action. On May 19, 2016, I notified your office by way of the attached correspondence that I will be unavailable for deposition on the dates noticed on your May 17, 2016, deposition notices.

I also provided the weeks of July 25, 2016 and possibly August 1, 2016, as alternate dates. As of the date of this letter I have not received any response from you regarding depositions nor am I in receipt of an amended deposition notice.

Please let me know, as soon as possible, if these dates work for you. **This the second notice to you regarding my dates of availability for depositions.**

Please be guided accordingly.

Sincerely,



La Mecia Ross-Tiggett

Enclosures



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September 9, 2016

VIA CERTIFIED/RRR AND REGULAR MAIL

La Mecia Ross-Tiggett
25103 Osprey Way
Princeton Junction, NJ 08550

**Re: LaMecia Ross-Tiggett v. Reed Smith LLP, et al.
Case No.: 1:15-cv-08083-JBS-AMD**

Dear Ms. Ross-Tiggett:

As you are aware, this firm represents the remaining Defendants, Reed Smith LLP and Christine Phillips Gonzales in the above matter. We are in receipt of your August 9, 2016 letter and write to address to issues raised therein as well as other outstanding discovery matters.

First, , you continue to be in default of all of your written discovery obligations, which includes the failure to provide answers to interrogatories and responses to Defendants' document demands. The failure to provide these documents is a violation of the Court's Scheduling Order. In order to avoid unnecessary court intervention, we once again request that these documents be provided to Defendants as required.

Further, despite our prior requests, including most recently on August 5, 2016, you have not provided dates for Defendants to take your deposition. Please provide us all available dates in September, October and November on which you are available for your deposition. Please keep in mind that your deposition will require at least two days. We anticipate receiving a response to this request by September 16, 2016, if not sooner, so that we may plan accordingly.

Finally, Defendants demand that you provide our office with a copy of the materials you provided to the Court, including the "CD-R containing Plaintiff's exhibits" as referenced in your March 4, 2016 correspondence. As you are aware, the Court has ordered that you produce same back in April. We have repeatedly followed up on the status of same to no avail. The failure to produce the CD-R is a direct violation of the Court's prior Order in this matter. As Mr. Kagan expressed previously, even if the CD-R is duplicative of documents previously produced, you must produce *a copy of the CD* provided to the Court, to Defendants.

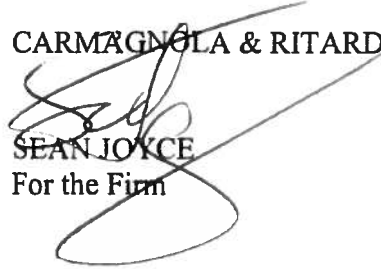
CARMAGNOLA & RITARDI, LLC

La Mecia Ross-Tiggett
September 9, 2016
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Finally, please provide us with all of these requested responses, documents and information by **September 23, 2016** in order to avoid unnecessary court involvement. Should you wish to discuss any of the above, please feel free to contact me.

Very truly yours,

CARMAGNOLA & RITARDI, LLC



SEAN JOYCE
For the Firm

cc: Domenick Carmagnola, Esq.